



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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June 24, 2003

Commander, Southern Division  
Naval Facilities Engineering Command  
Attn: Mr. Anthony Robinson  
2155 Eagle Drive  
North Charleston, South Carolina 29406

Re: 0971255048 -- Lake  
Great Lakes Naval Station  
Superfund/Technical Reports

Dear Mr. Robinson:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the Navy's Responses to Comments on the Draft Revisions to the Existing Quality Assurance Project Plan (QAPP) and the QAPP for Site 22 – Building 105 Old Dry Cleaning Facility, Naval Training Center Great Lakes, Great Lakes, Illinois. They were received via electronic mail on June 11, 2003. The Agency has reviewed the Navy's responses and has found a few minor points that require clarification. In addition, Illinois EPA also submits one correction to one of our original comments. These are listed below.

- 1) **Response to Comment number 2** – The written response does not fully address the comment to the Agency's satisfaction. However, subsequent telephone conversations with Mr. Bob Davis of Tetra Tech have proven to be beneficial by providing the Agency with a more thorough understanding of the Navy contractor's work process, which does allow some flexibility to adjust while in the field. Illinois EPA discussed their concern regarding the ability to obtain samples from different depths within the same water column, if appropriate, and this concept is to be dealt with in the field if the situation arises. Therefore, with this in mind, the Navy's response to this comment is acceptable.
- 2) **Response to Comment number 7** – The fourth sentence should be corrected to read "...chronic noncancer toxicity values (RfDc) will be used *for* most..."
- 3) **Response to Comment number 9** – This response was reported in the June 11, 2003 e-mail and subsequently modified in the June 18, 2003 e-mail. The modified response

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states that the exposures presented in Tables 6 and 9 are for less than a full day and that the inhalation rates in units of  $m^3$ /hour are appropriate. The Agency believes those exposures are for the adult residential and child residential receptors, respectively. The assumption for those two receptors is that the site will be developed into living quarters and subsequently inhabited by children and adults. Those exposures are typically characterized as full day exposures for a number of years utilizing assumptions of daily breathing rates. Please revise accordingly.

- 4) **Response to Comment number 10** – The original comment asked for revision of the exposure duration (ED) during the calculation of construction worker exposures of less than a year in duration. This was incorrect. The ED should remain one year. However, for the reasons given in our comment, the averaging time for noncarcinogenic chemicals (AT-N) should be corrected to 210 days to include construction exposures of 150 days.

Provided these points are addressed appropriately, Illinois EPA can agree that the Draft Revisions to the Existing Quality Assurance Project Plan (QAPP) and the QAPP for Site 22 – Building 105 Old Dry Cleaning Facility can be issued as a Final document. If you have any questions or require additional information, please contact me at (217) 557-8155 or by electronic mail at [brian.conrath@epa.state.il.us](mailto:brian.conrath@epa.state.il.us).

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

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cc: Owen Thompson, USEPA (HSRL-5J)  
Mark Shultz, US Navy - EFA Midwest  
Bob Davis, Tetra Tech NUS, Inc.